

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 1:24-cr-00003-SM-AJ-5
	)	
MICHAEL RAICHE	)	
	)	
Defendant,	)	
_____	)	

**Motion for Bail Hearing**

Michael Raiche, via undersigned counsel, requests a bail hearing and in support states:

Pursuant to 18 U.S.C. § 3142, Mr. Raiche maintains there is a a condition or combination of conditions that would reasonably assure Mr. Raiche's appearance as required by law.

Mr. Raiche stipulated to detention back in February 2024 following his initial appearance on a single count charging him with violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 846 Conspiracy to Distribute a Controlled Drug. Mr. Raiche is 48 years old and has no history of any crimes of violence. His criminal history is nominal. He has a DWI and Reckless Conduct conviction in 2015; a second DWI in approximately 2019; and a driving without giving proof of insurance in 2022.

He is a lifetime resident of New Hampshire with numerous and significant ties to the State of New Hampshire. He graduated high school and completed one year of mechanical engineering at UNH Manchester. His grandfather owned a Ford dealership in New Hampshire in the 1950's. Mr. Raiche is a mechanic by trade.

Mr. Raiche seeks consideration of the following release plan. He, with the assistance of his mother, has been paying \$800 a month to hold a bed for him at Bethany Chapel, 54 Newbury Rd, Manchester, NH 03103. We are in direct contact with Pastor Bob McKenney, the leader of

Bethany Chapel See, <https://www.bethanychapel.net/>. The program is similar to a halfway house. There are rules of sobriety. Mr. Raiche will be subject to random drug testing. It is a substance free environment. 8 beds. The program is part of what is called "Gracehaven." The City of Manchester itself is a partner in this project. Pastor Robert (Bob) McKenney can be contacted with any questions. Undersigned counsel can provide his cell number.

Mr. Raiche requests a bail hearing be scheduled at the Court's earliest convenience.

The government, through Assistant United States Attorney Heather Cherniske, objects.

Respectfully submitted,  
**MICHAEL RAICHE**

Date: November 26, 2024.

by: /s/ Matthew G. Stachowske  
Matthew G. Stachowske (#15609)  
Stachowske Law, PLLC  
634 Central Ave  
Dover, NH 03820  
O: 343-1842  
C: 770-9045  
matthew@stachowskelaw.com

**Certificate of Service**

I, Matthew G. Stachowske, hereby certify that I have mailed a copy of the within motion to Assistant United States Attorney Heather Cherniske, via the court's ECF facilities on today's date.

**LOCAL RULE 7.1(a)(2)**

Due to the nature of the relief sought a memorandum is unnecessary.

**LOCAL RULE 7.1 (c)**

Assent of the Respondent, via the United States Attorney's Office, was requested in the course of filing this motion.

/s/ Matthew G. Stachowske